

# **EXHIBIT A**

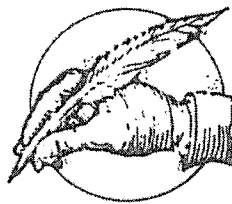
**In The Matter Of:**  
*Jonathan Santiago v.*  
*Thomas Lafferty, et al.*

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*Francis Matthews*  
*March 31, 2016*

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Original File Francis Matthews 3-31-16.txt

1 to an officer in a drug unit in a neighboring  
2 jurisdiction that that might compromise the  
3 confidential informant?

4 A. Yes.

5 Q. Why?

6 A. Because it's a very closely guarded -- it's  
7 closely guarded information when you have an  
8 informant. You don't share that outside of a  
9 specific need or a case. If you have a light  
10 case or maybe the informant came to another  
11 police officer and said, I'm currently  
12 working for this other agency, and then you  
13 have a direct conversation regarding a  
14 criminal matter. You never just call over to  
15 another police department and say, this is my  
16 informant. Do you guys have anything on him?

17 Q. That's because you would be afraid that the  
18 department might disclose the informant's  
19 identity, correct?

20 A. Correct.

21 Q. Now, if a confidential informant says, I  
22 worked for the State Police, would it be  
23 acceptable for that officer and that agency  
24 to call the State Police and see what they